## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

RONALD A. KATZ TECHNOLOGY	§
LICENSING, L.P.,	§
	§
Plaintiff,	§
	§
V.	§ Case No. 2:06CV334-DF
	§ (JURY)
AMERICAN AIRLINES, INC.; AMERICAN	§
BEACON ADVISORS, INC.; FEDEX	§
CORPORATION; FEDERAL EXPRESS	§
CORPORATION; FEDEX CORPORATE	§
SERVICES, INC.; FEDEX CUSTOMER	§
INFORMATION SERVICES, INC.;	§
HILTON HOTELS CORPORATION;	§
HILTON RESERVATIONS WORLDWIDE,	§
LLC; HILTON HHONORS WORLDWIDE,	§
LLC; MARRIOTT INTERNATIONAL,	§ §
INC.; MARRIOTT WORLDWIDE	§
RESERVATION SERVICES, LLC;	§
NATIONAL RAILROAD PASSENGER	§
CORPORATION, DBA AMTRAK,	§
	§
Defendants.	§

DEFENDANTS', FEDEX CORPORATION, FEDERAL EXPRESS
CORPORATION, FEDEX CORPORATE SERVICES, INC. AND FEDEX CUSTOMER
INFORMATION SERVICES, INC. UNOPPOSED MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S, RONALD A. KATZ TECHNOLOGY LICENSING, L.P.,
COMPLAINT FOR PATENT INFRINGEMENT

## TO THE HONORABLE JUDGE OF SAID COURT:

Defendants, FedEx Corporation, Federal Express Corporation, FedEx Corporate Services, Inc. and FedEx Customer Information Services, Inc., (collectively "Defendants"), without waiving any defenses or any matters that might be presented pursuant to Federal Rule of Civil Procedure 12(b), file this Unopposed Motion for Extension of Time to Answer or Otherwise

Respond to Plaintiff Ronald A. Katz Technology Licensing, L.P.'s ("RAKTL's") Complaint for Patent Infringement and would show the Court as follows:

Defendants were served with a copy of RAKTL's Complaint for Patent Infringement on August 24, 2006. The current deadline for Defendants to file their answer is September 13, 2006.

RAKTL's Complaint accuses Defendants of infringing sixteen (16) of the twenty (20) patents-in-suit. Plaintiff's claims for patent infringement present complex issues and Defendants require additional time to respond to the Complaint.

Defendants respectfully request the Court to extend the date on or before which they must file their Answer or to otherwise respond to Plaintiff Ronald A. Katz Technology Licensing, L.P.'s Complaint for Patent Infringement until October 16, 2006. Counsel for Defendants has conferred with Plaintiff RAKTL's counsel, and counsel has indicated that RAKTL does not oppose this Motion, and has agreed to the proposed extension.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that this Court grant Defendants' motion.

DATED: September 13, 2006 Respectfully submitted,

By: /s/ S. Calvin Capshaw
S. Calvin Capshaw
State Bar No. 0378390
BROWN MCCARROLL, LLP
1127 Judson Road, Suite 220
P.O. Box 3999 (75606-3999)
Longview, Texas 75601-5157
Telephone: (903) 236-9800
Facsimile: (903) 236-8787

E-mail: ccapshaw@mailbmc.com

OF COUNSEL: Jeffrey A. Berkowitz Virginia State Bar No. 65149 James J. Boyle Virginia State Bar No. 43870 FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190-5675

Telephone: (571) 203-2700 Facsimile: (202) 408-4400

E-mail: jeffrey.berkowitz@finnegan.com E-mail: james.boyle@finnegan.com

Richard L. Stroup
DC Bar No. 924696
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
901 New York Avenue NW
Washington, DC 20001-4413
Telephone: (202) 408-4000
Facsimile: (202) 408-4400

E-mail: richard.stroup@finnegan.com

ATTORNEYS FOR FEDERAL EXPRESS DEFENDANTS

## **CERTIFICATE OF SERVICE**

I hereby certify that the following counsel of record who are deemed to have consented to electronic service are being served this 13th day of September, 2006, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ S. Calvin Capshaw